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Attorneys for All Defendants

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

ESTATE OF SAOUN POL and J.P.,

Plaintiffs,

vs.

CITY OF STOCKTON, et al.

Defendants.

Case No.: 2:21-cv-00788-WBS-AC

**STIPULATION TO PLACE  
PREVIOUSLY FILED EXHIBITS IN  
SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PORTIONS OF  
FIRST AMENDED COMPLAINT  
UNDER SEAL AND FILE REDACTED  
COPIES; ORDER**

[No hearing requested]

1 This stipulation is entered into between Plaintiffs Estate of Saoun Pol and J.P. (collectively,  
2 “Plaintiffs”) and Defendants City of Stockton, the Stockton Police Department, Police Chief Eric  
3 Jones, Officer Jorge Andrade, and Officer Bradley Miller (collectively, “Defendants”), by and  
4 through their counsel of record.

5 RECITALS

6 A. On November 1, 2021, Defendants filed a motion to dismiss portions of Plaintiffs’  
7 First Amended Complaint for failure to state a claim on which relief may be granted pursuant to  
8 F.R.C.P. 12(b)(6) (“Defendants’ Motion”). Defendants’ Motion is set for hearing on  
9 November 29, 2021.

10 B. After filing Defendants’ Motion, Defendants’ counsel discovered that Exhibits A  
11 and B (attached to the Declaration of Jeff A. Rogers filed in support of Defendants’ Motion) were  
12 inadvertently filed containing Plaintiff J.P.’s full name in certain locations. (See ECF No. 17-2,  
13 Exhibit A, at p. 4, and Exhibit B, at pp. 7-8.) Plaintiff J.P. is a minor and his name (other than his  
14 initials) should be redacted pursuant to F.R.C.P. 5.2(a)(3) and Eastern District of California Local  
15 Rule 140.

16 C. The parties have since met and conferred and have agreed upon the following:

17 STIPULATION

18 1. Attached as Exhibits A and B to this Stipulation are *revised* Exhibits A and B in  
19 support of Defendants’ Motion, where all instances of J.P.’s name are appropriately redacted.

20 2. As for the previously filed Exhibits A and B attached to the Rogers Declaration  
21 (ECF No. 17-2, pp. 3-8), the parties request that the Court place them under seal pursuant to  
22 F.R.C.P. 5.2(a)(3) and Eastern District of California Local Rules 140 and 141. Defendants’ counsel  
23 will file the attached revised Exhibits A and B with appropriate redactions of J.P.’s name as a new  
24 ECF document and the newly filed revised Exhibits A and B will in all respects supersede pages  
25 3-8 of document number 17-2.

26 3. The parties further agree that this shall not affect the date of the hearing on  
27 Defendants’ Motion (November 29, 2021, at 1:30 p.m.) or the time for the parties’ respective  
28 opposition to, or reply on, Defendants’ Motion.

1 Respectfully Submitted,

2 Dated: November 3, 2021

HERUM CRABTREE SUNTAG  
*A California Professional Corporation*

3  
4 By: /s/ Joshua J. Stevens  
JOSHUA J. STEVENS  
Attorneys for all Defendants

5  
6 Dated: November 8, 2021

LAW OFFICE OF YOLANDA HUANG  
7 By: /s/ Yolanda Huang  
YOLANDA HUANG  
Attorney for all Plaintiffs

**ORDER**

The Court, having considered the parties' stipulation, and good cause appearing, rules as follows:


IT IS ORDERED that the relief requested in the foregoing Stipulation is GRANTED.

The Court Clerk is directed to place Document No. 17-2 under seal pursuant to F.R.C.P. 5.2(a)(3) and Eastern District of California Local Rules 140 and 141. Defendants' counsel shall refile the Rogers Declaration, with the revised Exhibits A and B attached, filed with this Stipulation, as a new ECF document and it shall in all respects supersede Document No. 17-2, previously filed in support of Defendants' Motion.

Nothing in this order shall affect the date of the hearing on Defendants' Motion (scheduled for hearing on November 29, 2021, at 1:30 p.m.) or the time for the parties' respective opposition to, and reply on, Defendants' Motion.

**IT IS SO ORDERED.**

Dated: November 9, 2021

  
**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**